

EXHIBIT 106-B
Redacted Version of
Document Sought to be Sealed

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. MDL No. 2843
CONSUMER PRIVACY USER Case No. 18-md-02843-VC-JSC
PROFILE LITIGATION
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CONFIDENTIAL

REMOTE DEPOSITION OF JACKIE CHANG

Thursday, December 16, 2021

Job No. 4976949

Reported Remotely and Stenographically by:

JANIS JENNINGS, CSR No. 3942, CLR, CCRR

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REMOTE DEPOSITION OF JACKIE CHANG, located
in Hillsborough, California, taken on behalf of the
Plaintiffs, beginning at 9:43 a.m., on Thursday,
December 16, 2021, sworn remotely by Janis Jennings,
Certified Shorthand Reporter No. 3942, CLR, CCRR,
located in the City of Walnut Creek, County of
Contra Costa, State of California.

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23

24

25

1 again? 11:23

2 Q. Do you know when Facebook first started 11:23

3 using APIs with its partners? 11:23

4 A. I'm not sure I understand that question. 11:23

5 Technically, I don't know. 11:23

6 Q. Do you know who came up with the various 11:23

7 APIs that Facebook has? 11:23

8 A. No. 11:23

9 Q. Are you familiar with the concept of Friend 11:23

10 Sharing on the Facebook platform? 11:23

11 A. I think I've heard of it, but I don't know 11:23

12 what it is. 11:23

13 Q. Are you aware that on the Facebook platform 11:23

14 for a period of time, when a friend downloaded an 11:24

15 app, that app could obtain access to that person's 11:24

16 friends via Friend Sharing APIs? 11:24

17 MR. FALCONER: Objection. Form. 11:24

18 Go ahead. 11:24

19 THE WITNESS: I don't remember. 11:24

20 BY MR. LOESER: 11:24

21 Q. You don't remember anything about that? 11:24

22 A. No. 11:24

23 Q. That's not something you were involved at 11:24

24 all in? 11:24

25 A. I don't remember. 11:24

1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED] " -- 11:56
3 DEPOSITION REPORTER: "However, in the 11:56
4 [REDACTED] ... " Go 11:56
5 ahead, please.
6 BY MR. LOESER.
7 Q. "... [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] 11:56
13 Do you see that? 11:56
14 A. Yes. 11:56
15 Q. Now, Miss Chang, do you recall being 11:56
16 involved in the -- making the changes that are 11:56
17 referred to here? 11:56
18 A. I don't. 11:56
19 Q. Why don't we go down this document to 11:56
20 page 2, under the heading "[REDACTED]." 11:56
21 Do you remember your involvement and the 11:56
22 conversation about [REDACTED]? 11:56
23 A. I remember [REDACTED] as a concept, 11:56
24 but I don't remember specific conversations. 11:57
25 Q. Okay. What was "[REDACTED]" as a 11:57

1 Q. "Apps can still [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 11:58
10 Do you see that? 11:58
11 A. Yes. 11:58
12 Q. Do you recall conversations around 11:58
13 [REDACTED]? 11:58
14 A. I don't. 11:58
15 Q. You have no memory of that? 11:58
16 A. Not specifically. 11:58
17 Q. Do you know what "deprecate" means? 11:58
18 A. Yes. To -- to remove or wind down or end. 11:58
19 Q. And so what [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] t; is that right? 11:59
23 A. Whatever was stated there. 11:59
24 Q. And so [REDACTED] [REDACTED]
[REDACTED] [REDACTED], and 11:59

1 [REDACTED] 12:12

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] 12:12

5 A. Again, I -- 12:12

6 MR. FALCONER: Objection. Form. 12:12

7 THE WITNESS: -- I don't recall at the time 12:12

8 to specify exactly what it is connected to. 12:12

9 BY MR. LOESER: 12:12

10 Q. Just a blank slate for you? 12:12

11 MR. FALCONER: Objection. Form. 12:12

12 THE WITNESS: Sorry. Is that a question 12:12

13 or... 12:12

14 BY MR. LOESER: 12:12

15 Q. Yeah. Yeah. Even looking at the email that 12:12

16 you wrote about this, you just can't remember 12:12

17 anything about it? 12:12

18 A. Yes. So, again, I was transitioning to a 12:12

19 new role, so this was not the top of my mind, and I 12:12

20 don't remember this. 12:12

21 Q. Is it fair to say that it was at the top of 12:12

22 your mind when you wrote this? 12:12

23 A. I don't remember at that time. 12:12

24 Q. Well, let's look at the next bullet: 12:12

25 "[REDACTED] [REDACTED] 12:13

1 that use [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 12:13
5 Facebook." 12:13
6 What does it mean if something is of 12:13
7 "[REDACTED] Facebook"? 12:13
8 A. So I can't infer what it meant at that time, 12:13
9 but [REDACTED] [REDACTED]
[REDACTED] [REDACTED]. 12:13
11 Q. Okay. And so you're making a recommendation 12:13
12 here for how to deal with integrations that involve 12:13
13 strategic value; is that right? 12:13
14 A. I don't remember specifically, so I don't 12:13
15 know how to answer that. 12:13
16 Q. Okay. It looks like in the email, you knew 12:13
17 enough about what read stream was or friend data to 12:13
18 use those words in this email and talk about what 12:13
19 should happen with that? 12:14
20 A. So, again, I don't remember enough at the 12:14
21 time to say that was the state of my mind. I don't 12:14
22 know. 12:14
23 Q. And what do you mean when you say, "Should 12:14
24 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]"? 12:14

1 that you came up with for dealing with, among 12:27

2 others, [REDACTED] [REDACTED]

3 [REDACTED]; right? 12:27

4 MR. FALCONER: Objection. Argumentative. 12:27

5 THE WITNESS: So, again, I don't know. 12:27

6 BY MR. LOESER: 12:27

7 Q. Now, Miss Chang, you were directly involved 12:28

8 in making the determination -- coming up with a 12:28

9 framework for the determination of what [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]; right? 12:28

12 A. So, again, I don't remember enough to say 12:28

13 that it was a determination. I just prepared a 12:28

14 [REDACTED], as 12:28

15 it said in the email. 12:28

16 Q. Tell me everything you can remember about 12:28

17 your involvement in figuring out which [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED]. 12:28

20 A. So, again, I don't remember. I moved on to 12:28

21 Internet.org. I don't know what happened after that 12:28

22 spreadsheet. 12:28

23 Q. I didn't ask you if you remember what 12:28

24 happened after that. I am just asking you to 12:28

25 describe for me, what is the sum total of what you 12:28

1 remember about your role in figuring out which 12:28

2 [REDACTED] [REDACTED]

3 [REDACTED]. 12:29

4 A. I don't remember. 12:29

5 Q. Did you receive annual performance reviews? 12:29

6 A. In what year? 12:29

7 Q. In any year. 12:29

8 A. I received a performance review. 12:29

9 Q. And in connection with your performance 12:29

10 review, were you required to describe what you did 12:29

11 during the year that was being reviewed? 12:29

12 A. I believe so, yes. 12:29

13 Q. And in those performance reviews, were you 12:29

14 careful to make sure that you described all of the 12:29

15 important, or at least the most important things, 12:29

16 you worked on? 12:29

17 A. At that time, yes. 12:29

18 Q. And so if this transition to Platform 3 and 12:29

19 your role in [REDACTED] [REDACTED]

20 [REDACTED] was 12:29

21 an important part of that year, that would be likely 12:29

22 discussed in the performance review? 12:30

23 A. I don't know. I can't speculate that. 12:30

24 Q. Okay. Would that be generally an accurate 12:30

25 statement, though, that the tasks that you performed 12:30

1 Q. And under the heading, [REDACTED] [REDACTED]
[REDACTED] " can -- the first bullet says, [REDACTED] [REDACTED]
[REDACTED] then "[REDACTED] [REDACTED]
[REDACTED] "[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]. " 14:26
6 Do you see that? 14:26
7 A. Yes. 14:26
8 Q. And, Miss Chang, do you recall being 14:26
9 involved in the [REDACTED] [REDACTED]
[REDACTED] ? 14:26
11 A. No, I don't recall. 14:26
12 Q. And do you recall the effort to figure out 14:26
13 [REDACTED] ? 14:26
14 A. I don't remember. 14:26
15 Q. Do you remember anything at all about any 14:26
16 involvement you had in the subject matter of 14:26
17 whitelists? 14:26
18 A. Sorry. Can you state that question again? 14:26
19 Q. Do you remember being involved in any way in 14:26
20 figuring out [REDACTED] ? 14:26
21 A. Not -- I don't remember. 14:26
22 Q. This slide over on the right side refers to 14:27
23 "[REDACTED]. " 14:27
24 Was the rollout to [REDACTED] [REDACTED]
[REDACTED] ? 14:27

1 A. Yes, I see that there. 14:28

2 Q. And do you see that those are -- those [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]. Is 14:29

5 that your understanding? 14:29

6 A. So -- yeah, so I don't know the context of 14:29

7 that, so I don't -- I don't know if it really is or 14:29

8 isn't. 14:29

9 Q. Okay. But you see that for [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]"? 14:29

12 A. Yes, I see that. 14:29

13 Q. And do you see under [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]"? 14:29

16 A. Yes, I see that. 14:29

17 Q. Okay. Go to the next slide. 14:29

18 Now, Miss Chang, you were involved in 14:29

19 preparing for the deprecations of these permissions, 14:29

20 were you not? 14:29

21 A. Again, I -- I don't remember. 14:30

22 Q. Okay. If you look at the first bullet, it 14:30

23 says: 14:30

24 "[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] 14:30

1 [REDACTED])." 14:30

2 Do you recall there being [REDACTED]

3 [REDACTED]? 14:30

4 A. Again, I don't remember this. 14:30

5 Q. Okay. And you look at the next one: 14:30

6 "[REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED]. " 14:30

9 Do you recall what that refers to? 14:30

10 A. No. 14:30

11 Q. This next bullet item is: 14:30

12 "[REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED]. " 14:30

16 Do you have an understanding of what 14:30

17 "extensions" are? 14:30

18 A. I know what an extension is, but I don't -- 14:30

19 I don't recognize in this context. 14:30

20 Q. Yeah. You don't recall in any way your 14:30

21 involvement in sorting out whether [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED]? 14:31

24 A. I don't remember. 14:31

25 Q. Okay. And: 14:31

[illegible]

1 MR. FALCONER: Objection. 14:35

2 THE WITNESS: I don't remember. 14:35

3 BY MR. LOESER: 14:35

4 Q. Okay. Well, let's look at what it says you 14:35

5 were doing -- 14:36

6 SPECIAL MASTER GARRIE: Sorry. When we get 14:36

7 to a breaking point -- any idea when that may be? 14:36

8 MR. FALCONER: I was thinking after the 14:36

9 next -- after we are done with this document. 14:36

10 MR. LOESER: That's fine. 14:36

11 SPECIAL MASTER GARRIE: And then I would 14:36

12 like all the lawyers to be moved into another room. 14:36

13 Thank you. 14:36

14 BY MR. LOESER: 14:36

15 Q. Miss Chang, if you look at the [REDACTED] [REDACTED]

[REDACTED], you will see the last bullet. 14:36

17 Can you read that last bullet, please? 14:36

18 A. "Jackie leading on putting together 14:36

19 a [REDACTED] [REDACTED]

[REDACTED]."

21 Q. And is that accurate? 14:36

22 A. Again, I don't remember. 14:36

23 Q. So as you sit here today, you have zero 14:36

24 recollection of your being [REDACTED] [REDACTED]

[REDACTED] 14:36

1 [REDACTED]? 14:36

2 A. I don't remember this specifically. 14:36

3 Q. Do you remember anything at all about it? 14:36

4 A. No, I don't. 14:36

5 Q. Okay. Let's move up the string to page 2 of 14:37

6 the string under the same heading, [REDACTED] [REDACTED]

7 [REDACTED]. 14:37

8 You will see that this update, if you go 14:37

9 farther up the string, is November 25th, 2013. It 14:37

10 was sent by Simon Cross. The first recipient in the 14:37

11 "to" list is you. 14:37

12 Do you see that? 14:37

13 A. Sorry. What date? 14:37

14 Q. November 25th, 2013. 14:37

15 A. Okay. 14:37

16 Q. First recipient, first person Simon put on 14:37

17 that "to" line was Jackie Chang; right? 14:37

18 A. Well, I don't know if I'm -- I'm the first 14:37

19 person that shows up there. 14:37

20 Q. All right. And let's go down to "[REDACTED] [REDACTED]

21 [REDACTED]. So why don't you read the second 14:37

22 bullet. 14:37

23 A. "[REDACTED] -- Jackie 14:37

24 working closely with Marie and [REDACTED] [REDACTED]

[REDACTED] 14:37

1 [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]." 14:38
6 Q. So do you remember working closely with 14:38
7 Marie in [REDACTED] 14:38
8 A. I don't. 14:38
9 Q. And who is Marie? 14:38
10 A. I don't know which Marie it may be referring 14:38
11 to. 14:38
12 Q. Okay. And so, Miss Chang, you're telling 14:38
13 the jury that even though this bullet indicates that 14:38
14 you were "working closely with Marie in [REDACTED] [REDACTED]
[REDACTED]
[REDACTED], " you have utterly no recollection of anything 14:38
17 relating to that task? 14:38
18 A. Correct. 14:38
19 MR. LOESER: This is a fine time to take a 14:38
20 break, as Special Master Garrie has requested. 14:38
21 THE VIDEOGRAPHER: Okay. This marks the end 14:39
22 of media No. 3 in the deposition of Jackie Chang. 14:39
23 Going off the record. The time is 2:39. 14:39
24 (Off the record.) 14:39
25 THE VIDEOGRAPHER: This marks the beginning 15:04

1 A. Yes. 15:20

2 Q. Okay. If you could please read the third 15:20

3 bullet. 15:20

4 A. "[REDACTED] [REDACTED]

5 [REDACTED] - 15:20

6 apps will only [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] 15:20

13 Q. Okay. And do you recall the -- that as part 15:20

14 of this PS12 update, there was going to be the 15:20

15 removal of access to non-app friends permissions? 15:20

16 A. So I don't remember. 15:21

17 Q. Okay. And if you look at -- can you read 15:21

18 the next bullet. 15:21

19 A. "[REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]."

22 Q. Okay. Do you know what that means and do 15:21

23 you recall that happening? 15:21

24 A. I know what I think [REDACTED] [REDACTED]

[REDACTED], but I 15:21

1 A. Yes. I remember the slide. 16:24

2 Q. Right. And you helped develop those 16:24

3 categories; right? 16:24

4 A. I don't remember specifically. 16:24

5 Q. But your email appears to indicate that you 16:24

6 helped to develop those categories; right? 16:24

7 A. So, again, whatever the email says, but I 16:24

8 don't remember that specific moment in time. 16:25

9 Q. And Miss Chang, do you know how many total 16:25

10 apps and partners were given continued access to 16:25

11 friends permissions? 16:25

12 A. No, I don't. 16:25

13 Q. How about read permissions? 16:25

14 A. I don't. 16:25

15 Q. Do you know if there were records kept of 16:25

16 all the apps and partners that were given continued 16:25

17 access to friends and read permissions? 16:25

18 A. I don't know. 16:25

19 Q. Who would know that? 16:25

20 A. I don't -- I don't know. 16:25

21 Q. Okay. You have no idea? 16:25

22 A. Not for an individual person, no. 16:25

23 Q. And so in your work now with academic 16:25

24 partnerships, if you wanted to figure out if an 16:25

25 academic partner had continued access to friends 16:25

1 know if it could be classified as whitelist. 16:28

2 Q. The term "whitelist" is not one you have 16:28

3 used so frequently that you remember to this day 16:28

4 what it means? 16:28

5 A. No. 16:28

6 Q. Do you have any idea of the process that's 16:28

7 used to determine if an app developer or partner is 16:28

8 whitelisted so that they have continued access to 16:28

9 friends permissions? 16:28

10 A. Yeah. I don't recall it. 16:28

11 Q. Do you know if Facebook keeps records of 16:28

12 whitelisted developers/partners? 16:28

13 A. I don't know. 16:28

14 Q. You have no recollection at all as to 16:28

15 whether that information is collected and maintained 16:29

16 in one place so that someone could easily find out 16:29

17 who are all of the whitelisted partners or 16:29

18 developers? 16:29

19 A. So again -- 16:29

20 MR. FALCONER: Asked and answered. 16:29

21 THE WITNESS: -- that's outside my scope, so 16:29

22 I don't know. 16:29

23 BY MR. LOESER: 16:29

24 Q. Now, if we go back to slide -- I'm sorry, 16:29

25 deck -- Exhibit 12 for a minute. And if you look at 16:29

1 THE WITNESS: So, again, I don't -- I don't 16:34
2 remember, so I can't assume. 16:34

3 BY MR. LOESER: 16:34

4 Q. Did you have any interaction with a partner 16:35
5 in a discussion of the information -- the 16:35
6 permissions the partner was interested in, where 16:35
7 they said to you, Hey, we want to arrange so that we 16:35
8 have permission to access friends_video? 16:35

9 A. I don't remember specifically like 16:35
10 individual permissions. 16:35

11 Q. Okay. Do you remember any conversations at 16:35
12 all about friends permissions with any partner? 16:35

13 A. I don't remember specifically anything about 16:35
14 friends permission. 16:35

15 Q. Do you remember anything generally about 16:35
16 friends permissions? And particularly, I'm asking 16:35
17 if any partner that you have worked with raised that 16:35
18 as a permission that they were interested in gaining 16:35
19 access to. 16:35

20 A. I don't -- I don't -- I don't recall. 16:35

21 MR. LOESER: Okay. We can go to Exhibit 21. 16:36

22 (Exhibit 20 marked for identification.) 16:36

23 MR. LOESER: Oh, is it 20? Yeah. 16:36

24 While that's being loaded, for the record, 16:36
25 this is an email from Simon Cross to, among others, 16:36

1 yourself, dated October 24th, 2013, "Subject: 16:37
2 [REDACTED] - feedback by 16:37
3 end of day Sunday, please." With attachment, 16:37
4 "[REDACTED]," attaching an 16:37
5 Excel spreadsheet. 16:37
6 BY MR. LOESER: 16:37
7 Q. Do you see that document, Miss Chang? 16:37
8 A. I see the email, yes. 16:37
9 Q. So this email starts with Mr. Cross saying: 16:37
10 "Hi guys, Over the last few weeks, 16:37
11 you'll have noticed [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] Going forward, this 16:37
14 [REDACTED] [REDACTED] 16:37
15 of our lives -- it's where [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED] " 16:38
23 Did I read that accurately? 16:38
24 A. Yes, you -- yes. 16:38
25 Q. Do you recall receiving this email and the 16:38

1 attachment that it provides? 16:38

2 A. I don't recall it specifically. 16:38

3 Q. Do you recall it at all? 16:38

4 A. No, I don't. 16:38

5 Q. And can you tell me what "app-based GKs" 16:38

6 are? 16:38

7 A. I don't know. 16:38

8 Q. You have no recollection whatsoever? 16:38

9 A. No. Again, I'm not -- I'm not the technical 16:38

10 person, so I just don't -- I don't know technically 16:38

11 what it would mean. 16:38

12 Q. Okay. Do you know what the Capabilities 16:38

13 tool was? 16:38

14 A. Not specifically. I've heard of it, but I 16:38

15 don't know it in detail. 16:39

16 Q. Well, what have you heard about it? 16:39

17 A. It looks like some sort of permissioning 16:39

18 tool. 16:39

19 Q. And what does that mean? 16:39

20 A. It grants permissions. 16:39

21 Q. Who does it grant permissions to? 16:39

22 A. So, again, I don't -- I don't know the 16:39

23 technical specifics, so I don't feel comfortable 16:39

24 talking about it in depth because I might 16:39

25 mischaracterize it. 16:39

1 Q. Okay. You've said all that you feel 16:39
2 comfortable saying about it? 16:39

3 A. Well, like all that I know about it. 16:39

4 Q. And before I asked you if there was a place 16:39
5 where whitelists were managed, and this seems to 16:39
6 indicate that [REDACTED] [REDACTED]

7 [REDACTED]. 16:39

8 Does that refresh your recollection about 16:39
9 where whitelists are managed? 16:39

10 A. No. 16:39

11 Q. Okay. And this uses the term "[REDACTED] [REDACTED]
12 [REDACTED]," which previously we saw you were 16:40

13 tasked with various things having to do with 16:40

14 [REDACTED]. 16:40

15 Can you provide any more information on your 16:40
16 understanding of [REDACTED]? 16:40

17 MR. FALCONER: Objection. Form. 16:40

18 THE WITNESS: No. Again, this wasn't the 16:40
19 top of like my -- my focus, so I don't really have a 16:40
20 lot of recollection around this. 16:40

21 BY MR. LOESER: 16:40

22 Q. Do you recall that based on the information 16:40
23 that was sent to you here and the description of 16:40
24 this email, there were [REDACTED] [REDACTED]

25 [REDACTED] 16:40

1 yes, it seems like I'm posing the question. 17:01

2 Q. So, certainly, as of the date of this email, 17:01

3 March 24, 2014, you knew that there would be [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]d; right? 17:02

7 A. So I don't know, at that moment in time. 17:02

8 Q. So looking at what you wrote, you're telling 17:02

9 me you can't determine, based on what you wrote, 17:02

10 that there were [REDACTED] [REDACTED]

11 [REDACTED] for 17:02

12 PS12N? 17:02

13 A. I know what I wrote, but I don't remember it 17:02

14 in specificity where I would know the full context 17:02

15 of what you're implying. 17:02

16 Q. Okay. Do you have any reason to believe 17:02

17 that the information that you wrote in this email is 17:02

18 inaccurate? 17:02

19 A. I don't know. 17:02

20 Q. You don't have any reason to believe that, 17:02

21 do you? 17:02

22 A. I mean, there's always a possibility of 17:02

23 inaccuracy, but I don't know. It's not my intent to 17:02

24 be inaccurate. 17:03

25 Q. Did you have any involvement at any point in 17:03

From: Konstantinos Papamiltiadis </O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=942ACCD3D3C54FBEA8B7253E97A8A6D7>
Sent: Wednesday, August 21, 2013 8:09 AM
To: Ime Archibong; Jackie Chang
Cc: Chris Daniels; Simon Cross
Subject: Re: [REDACTED]
Attachments: [REDACTED].xlsx

+ Simon

Thanks a lot, Jackie. This is great – I have included the additional info for the [REDACTED] in the attached spreadsheet as well (for completeness).

A little update from my end, and how I think we should tie this to what Jackie has put together. Simon managed to pull a list of [REDACTED]s. You can see [REDACTED]. The most interesting data points having [REDACTED] (I took the liberty to make a recommendation as well btw – [REDACTED]):

1/ [REDACTED] ([REDACTED]): [REDACTED] The main reason is [REDACTED]. Typical example is [REDACTED]. Removing access to the full friends list for [REDACTED]s. My recommendation is: [REDACTED]

2/ [REDACTED] ([REDACTED]): [REDACTED] Recommendation: [REDACTED]

3/ [REDACTED] ([REDACTED]): From [REDACTED] and the likes. Some of them should obvious not have access such as [REDACTED], etc. In particular for [REDACTED] we should use the framework developed by Jackie. RECOMMENDATION: User Jackie's framework

4/ [REDACTED] ([REDACTED]): Unlike the other [REDACTED] a lot more [REDACTED]. If we restrict access to user's friends that [REDACTED]s. However, I think we need to [REDACTED] this one and [REDACTED] given they are [REDACTED]. Recommendation is: [REDACTED]

5/ [REDACTED] ([REDACTED]): [REDACTED] listed here, mostly focused on [REDACTED] and to a lesser extend on [REDACTED] (this was the dominant category for newsfeed inside [REDACTED] The use of Friends list is [REDACTED] here, if I may say. I would love to know if [REDACTED] – I suspect [REDACTED] data. My recommendation is: [REDACTED] This may surprise you, but I am working on a deck to assess the [REDACTED] and I think besides [REDACTED] we can [REDACTED], while [REDACTED] My plan was to finish this before the end of the week (when I am off on holidays), but most probably I will conclude it when I am back.

6/ [REDACTED] ([REDACTED]): Also a [REDACTED] under this category. Friends list is [REDACTED]b. Us removing full access to the friends list would [REDACTED]s. Recommendation is: [REDACTED]

7/ [REDACTED] of apps on this vertical. They need access to [REDACTED] without this, however, I am not sure if it's a vertical that [REDACTED]
Recommendation is: [REDACTED]

8/ [REDACTED] use case here. However I don't think we should [REDACTED] them [REDACTED] and we should [REDACTED] with [REDACTED]
Recommendation is: [REDACTED]

9/ [REDACTED] Most of the unknown are in fact [REDACTED], investigating. In any case, [REDACTED]. Recommendation is: [REDACTED]

As a general note, I think we need to carry on with this exercise to figure [REDACTED] that we [REDACTED], before we can make a decision for [REDACTED]. For both the [REDACTED], we can use Jackie's framework to assess [REDACTED] for those partner falling under the [REDACTED] and then make up a decision based on the criteria outlined by Jackie below.

Let me know what you think,
kp

From: Ime Archibong <ime@fb.com>

Date: Wednesday, August 21, 2013 6:31 AM

To: Jackie Chang <jackie@fb.com>

Cc: Chris Daniels <chrisd@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>

Subject: Re: [REDACTED]

Thanks, Jackie. Glad you two linked up on this work. Looks like you have the right buckets flagged. One nitpick suggestion would be to [REDACTED] under some term that represents [REDACTED]
[REDACTED] We know that there is going to be [REDACTED] coming out of these changes, but we're just looking [REDACTED].

Sent from my iPhone

On Aug 21, 2013, at 2:30 AM, "Jackie Chang" <jackie@fb.com> wrote:

Ime & Chris,

Working with KP to further [REDACTED] that we should address. KP is working on the pulling the same analysis of [REDACTED], but we're also working in parallel to [REDACTED] that we should be solving for:

<https://docs.fb.com/sheet/ropen.do?rid=osbge9fce0156e72340bc9b80ea4fa6bdc2f8>

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED] Potential partners/cases that may [REDACTED]
- [REDACTED] that use read stream or friend data and [REDACTED]. Should [REDACTED] to fb.

- [REDACTED] to fb. [REDACTED]
[REDACTED], but may need some [REDACTED].
- [REDACTED] who's [REDACTED]
[REDACTED] Should be part of [REDACTED] flag.
- In the Pipeline: [REDACTED] in the works where they've been [REDACTED] fb.
This may be [REDACTED] as our [REDACTED] and
[REDACTED] that they [REDACTED]

This should be complete by EOW; however, Constantin will be using this on Thurs for a discussion with Vernal on [REDACTED]. Let us know of any feedback.

Thanks!

Jackie

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From: Simon Cross </O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SIMON CROSS>
Sent: Tuesday, December 10, 2013 12:28 PM
To: Jackie Chang; Ime Archibong; Konstantinos Papamiltiadis; Bryan Hurren; Monica Mosseri
Subject: Re: Simon's Updates - 6th Dec

[REDACTED] on [REDACTED]

- [REDACTED] plan to launch around Dec 22nd or may delay until 2nd week in Jan
- Work on both sides to [REDACTED] before we look to launch.
- Need [REDACTED] to get final OK to launch

[REDACTED]

- [REDACTED] - [REDACTED] coming close to [REDACTED], [REDACTED]. Next step is work with [REDACTED] altogether
- [REDACTED] - [REDACTED] [REDACTED] - now being checked by [REDACTED] before being setup to [REDACTED] - will be used by [REDACTED], and by [REDACTED]

[REDACTED]

- Approval from [REDACTED] to continue along the chosen path with [REDACTED]/[REDACTED] ([REDACTED] we get [REDACTED], they get [REDACTED]). Next steps are to sharpen up the work on FB's side to give them access to [REDACTED] [REDACTED] [REDACTED] and which [REDACTED] [REDACTED] that.
- Beginning to plan strategy for [REDACTED] around [REDACTED] [REDACTED] from aggregators or [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] ([REDACTED])

- Deal [REDACTED] - still waiting for a [REDACTED] [REDACTED] [REDACTED], but more likely now in [REDACTED]
- [REDACTED] (for now) until the [REDACTED] [REDACTED].

--
Simon Cross
Product Partnerships, Facebook

From: Simon Cross <si@fb.com>
Date: Monday, November 25, 2013 at 8:41 AM
To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Mosseri <mwalsh@fb.com>
Subject: Re: Simon's Updates - 22nd Nov

- Met with Trip [REDACTED] onsite in MPK. They were [REDACTED] but they understood our message about consistency and were glad we're working to improve conversion across the board. We told them [REDACTED] date. We agreed to work with them to [REDACTED].

- SoundCloud weeks away from launching their new album-art image heavy widget. Ime and I working to get approval to ramp their HTML5 widget to 100% of users (currently 1% of users and 100% of employees not in lifestand). Some eng work needed on our side, and a security review likely, but no other major blockers other than bandwidth on our side.

- [REDACTED]
- [REDACTED] – Jackie working closely with Marie and [REDACTED]
- [REDACTED]

- Met with [REDACTED] / [REDACTED] to scope out the [REDACTED] as part of our [REDACTED]. Subsequently met with [REDACTED]. Need another iteration on the exact API methods which need to be improved/built, and the [REDACTED] <[REDACTED]> we need them to implement.
- Starting to work more closely with the [REDACTED] [REDACTED] [REDACTED] etc) and [REDACTED] [REDACTED] [REDACTED]). Out of this may fall [REDACTED] as well as companies new to us like [REDACTED]. Early days for this work stream, and the team is still settling in from the re-org – so please forward request around [REDACTED] to Me+Rob rather than going directly to the product team so as to reduce thrash for them.

S

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Simon Cross
Product Partnerships, Facebook

From: Simon Cross <si@fb.com>

Date: Friday, November 8, 2013 at 6:59 PM

To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwalsh@fb.com>

Subject: Re: Simon's Updates - 8th Nov

PLATFORM

- [REDACTED] sent us their [REDACTED] so the team can get testing
- [REDACTED] gave us some [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
- [REDACTED] still [REDACTED] [REDACTED] [REDACTED]
[REDACTED] We're going to have a call to tease this out some more, and sync with Aryeh on if this is a thread worth following

- KP had a call with Trip Advisor who have some feedback/concerns about this materially affecting their business. We need to work through these to drive deprecation by Jan 31

- [REDACTED] are back in for the [REDACTED]. They confirmed that [REDACTED] [REDACTED]
for them and so they're going to [REDACTED]. Graham is working to on board them onto the [REDACTED]
- The [REDACTED]
[REDACTED]. Call next week with
[REDACTED] to discuss the details.

- Landed on a clear [REDACTED] for the work we need to do to prep for PS12n – [REDACTED]
[REDACTED]
[REDACTED]; <https://our.intern.facebook.com/intern/projects/milestones/?id=1434646163424174>
- [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED]
- Key focus this week is [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
- Jackie leading on putting together a [REDACTED] t.

Simon Cross
Product Partnerships
www.facebook.com/sicross @sicross
 Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA

From: Simon Cross <si@fb.com>
Date: Monday, October 28, 2013 at 10:40 AM
To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis <kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwalsh@fb.com>
Subject: Re: Simon's Updates - 25th Oct

PLATFORM

- [REDACTED] have coverage for [REDACTED]. Shipping [REDACTED] week, awaiting updated mocks from us to share with [REDACTED]
- [REDACTED] still [REDACTED] this week also

- [REDACTED] flow working end to end
- [REDACTED], but will revisit [REDACTED] before year end

- [REDACTED] (s) committed to [REDACTED]
- [REDACTED] – KP speaking them this week
- [REDACTED] – [REDACTED] – hope to [REDACTED]

- [REDACTED] may be back in the [REDACTED] if they their lawyers allow them to [REDACTED] [REDACTED] [REDACTED]
[REDACTED] Update this week

- Discussions ongoing with [REDACTED] deadline tight. [REDACTED]
[REDACTED]

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Simon Cross

Product Partnerships

www.facebook.com/sicross @sicross

Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA

From: Simon Cross <si@fb.com>

Date: Friday, October 11, 2013 5:33 PM

To: Jackie Chang <jackie@fb.com>, Ime Archibong <ime@fb.com>, Konstantinos Papamiltiadis
<kpapamiltiadis@fb.com>, Bryan Hurren <bryanhurren@fb.com>, Monica Walsh <mwash@fb.com>

Subject: Simon's Updates - 11th Oct

PLATFORM

[REDACTED] is done!

- [REDACTED]
- All other [REDACTED] also – no one using it anymore to our knowledge

[REDACTED] – [REDACTED] [REDACTED] –
[REDACTED]. Given this feedback to Product who are rethinking how
to test

- [REDACTED] will tell us on Weds if [REDACTED] [REDACTED]. Fingers Crossed. We have done
everything we can to convince them.

- [REDACTED] to have [REDACTED] by the end of next week – hope to have more info [REDACTED] by end of Oct

- no updates from [REDACTED]

[REDACTED]
- [REDACTED] pitched their vision of what they'd like to see us build for [REDACTED] – passed this to the product team
- [REDACTED] also have ideas – they're going to work them up and send them over in a couple of weeks

[REDACTED]
- [REDACTED] added to the [REDACTED] and starting to do end to end testing of the export flow

[REDACTED] [REDACTED]
- [REDACTED] [REDACTED] who pushed us again on [REDACTED] on our side to get this across the line – not high-pri, so made no firm commitments.

[REDACTED] [REDACTED]
- major product update: we're moving to [REDACTED] This has impact [REDACTED] – still analyzing impact of this on planning – will [REDACTED] s.

- [REDACTED] [REDACTED] [REDACTED]

[REDACTED]
- [REDACTED] [REDACTED] [REDACTED]

[REDACTED]
- Preparations continue for [REDACTED] – [REDACTED]

[REDACTED]
[REDACTED] are sending us [REDACTED] – this may put us back and increases the risk we [REDACTED] so will have more info on eta impact hopefully next week.

[REDACTED]
Met with [REDACTED] [REDACTED] [REDACTED] to improve [REDACTED] t. They're also interested in us helping them acquire [REDACTED] [REDACTED] [REDACTED] Early stages, but preparing the ground for effort here in Q1 2014

Bonus:

I Worked on a s [REDACTED] [REDACTED] [REDACTED] – this drives you to [REDACTED] p. Was picked to present to [REDACTED] next Tues (10/15). Feedback more broadly has been positive, so looking at changes/features and roadmap to help this ship.

S

--

Simon Cross

Product Partnerships

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Facebook, 1601 Willow Road, Menlo Park, CA 94025, USA